

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ORANGEBURG DIVISION

JEROD J. COOK #282755,	)	Case No. 5:14-cv-1938-RMG-KDW
	)	
Plaintiff,	)	
	)	
vs.	)	<b><u>DEFENDANT’S MOTION FOR ENTRY</u></b>
	)	<b><u>OF CONFIDENTIALITY ORDER</u></b>
LT. JORDAN WILLIAMS,	)	
	)	
Defendant.	)	
	)	

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The attached proposed Consent Confidentiality Order is requested by the Defendant, but Defendant is informed and believed that Plaintiff consents to the entry of a Confidentiality Order. Plaintiff has noted that he is “not opposed to the issuance of a confidentiality order.” ECF No. 88 at 2. However, Plaintiff has not provided a proposed version of the Confidentiality Order redlined with Plaintiff’s amenable terms.

The attached proposed Confidentiality Order is a modified version of the standard form on the Court’s website and the modifications have been indicated by attaching a “redlined” copy of the document. An explanation of the basis for each proposed modification is as follows:

Paragraph 5(b)(2) has been changed with the addition of a provision that counsel for Plaintiff expressly agrees not to provide any South Carolina Department of Corrections (“SCDC”) internal policies and procedures (“Policies”) marked “RESTRICTED” to Plaintiff or any other inmate in accordance with SCDC policies prohibiting inmates from being shown or provided with said policies or any portion thereof.

Paragraph 7 has been changed to reflect that the Policies are to be afforded greater protection than other documents produced in discovery. The paragraph contains specific procedures for the maintenance and handling of both Restricted and Non-Restricted Policies

consistent with the well-established practices of SCDC. This greater protection is necessary because SCDC internal policies and procedures directly impact the safety and security of both the inmates and employees of SCDC, and the control of the publication of those policies and procedures is strictly enforced to ensure the continued safety and security of both inmates and employees.

Paragraph 9 has been changed with the addition of subparagraph (c), which specifically requests Plaintiff stipulate that he is no longer in possession of any SCDC Policies which may have been in his possession during the litigation. This is in accordance with standard SCDC policy that no inmate may retain copies of any SCDC policy, as inmates may review all non-restricted SCDC Policies at their institutional law libraries.

Respectfully submitted,

CORRIGAN & CHANDLER LLC

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